

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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CHERYL SAGATAW and  
DEANTHONY BARNES, *on behalf of  
themselves and a class of  
similarly-situated individuals,*

Plaintiffs,

vs.

MAYOR JACOB FREY, *in his  
individual and official capacity,*

Defendant.

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Civil Action No.  
0:24-cv-00001-ECT/TNL

**DECLARATION OF CHRISTIN  
CRABTREE IN SUPPORT OF  
COMPLAINT AND MOTION  
FOR TEMPORARY  
RESTRAINING ORDER**

**DECLARATION OF CHRISTIN CRABTREE**

I, Christin Crabtree, pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is Christin Crabtree and I am 43 years old.
2. I live in South Minneapolis, in Corcoran neighborhood, and was born in Minnesota. I graduated high school at Hopkins and college at Augsburg. I have lived here my entire adult life and am a mother raising my children here.
3. I am a long-time advocate against domestic violence and sexual abuse and for healing recovery. I have served as the Board Vice Chair of the Domestic Abuse Project and am currently on the Board. I was a volunteer with Break the Silence, which ended the statute of limitations for survivors of sexual violence to come forward, ended the marital rape exclusion, and built the memorial at Boom Island Park. I am a past board member for the StepUP Program at Augsburg College, and YO! The Movement (Youth Organizing). In my professional life I work at a fortune 500 corporation where I am a founding member of a domestic violence awareness employee resource group, served as chair to the community outreach committee of our corporate Women's ERG, and currently sit on the Employee Community Team of our corporate foundation where I review grant applications from organizations across the Twin Cities.
4. I myself am a survivor of abuse and live with complex post-traumatic stress disorder (PTSD).
5. Camp Nenookaasi is an Indigenous-led healing camp. The number of residents at Camp Nenookaasi varies from day to day. But as of the beginning of this week, we had 186 residents and were in the process of housing 52. That would leave about 134 people who, at the end of this week, will still be without permanent or long-term housing. To date, we have successfully helped 74 people find long-term or permanent housing. But we have more work to do.
6. I met Nicole Mason last winter, in February 2023. We both had seen the impact of repeated evictions by the City of Minneapolis, particularly on compounding the epidemic of Missing and Murdered Indigenous Women. In response, we raised money for a mutual aid van to bring resources to unhoused people and help unhoused people get to ceremony, medical appointments, etc. The van is meant to not only help people get their physical needs met, but to connect them to their community and culture. For example, the van was used by "sobriety warriors" who brought Native relatives to Sun Dance.
7. The State itself has recognized that MMIW is a public health emergency, and even created offices for Missing and Murdered Indigenous Relatives and Missing and

Murdered Black Women and Girls. This is a known issue, but the City's policies of repeated evictions undermine these goals to say the least.

8. On August 17, 2023, there was an eviction of an encampment at Franklin and Minnehaha. Nicole went down to try to help people, particularly because there were many disabled and elderly people struggling and scrambling to get their belongings. She brought her van and drove people to different organizations, trying to find a place for them to be. But there was no where for them to go, all of these organizations were at capacity. So Nicole took the relatives out to eat and called me. She told me that she was going to follow them back to the Wall of Forgotten Natives, because there was no where else they could go. We agreed enough was enough and we needed to support these people we have come to know and love.
9. Many of the people who went back to the Wall had been there before. They had returned through a cycle of repeated evictions. We wanted things to be different this time. We wanted to bring robust services and resources to people to support them and break these cycles of violence, houselessness, and addiction. The plan was to unite in community, to build and strengthen our solidarity, and stand together rather than fighting over scraps.
10. On August 23, 2023, we were served with an eviction notice by an overwhelming number of Minnesota State Troopers. They were handing out pieces of paper apparently intended to be helpful. These papers listed the number of the American Indian Community Development Corporation (AICDC), who later informed us they had not consented to have their number listed; two outreach workers from the City, one of whom had not worked for the City for at least eight months; and the Hennepin County Shelter Connect phone number, which barely had beds available. This was incredibly traumatic for people to be given such short notice and a complete lack of meaningful resources—it felt like they handed out those papers to say they did something, but those resources weren't real.
11. August 23 was an extremely hot day. After we were served with the eviction notice, a beloved community member passed away. He was found having a seizure, which appeared to be from the heat because he was non-responsive to Narcan. When emergency responders arrived, they cursorily checked his pulse and walked away. Nicole and others carried him, begging for him to be given more adequate medical treatment. But soon he was gone. It was so very dehumanizing and traumatic. A ceremonial fire was started, as part of mourning his death and helping his spirit with safe passage to the next world.
12. On August 24, 2023, residents were evicted. That morning, we held a press conference and invited elected officials to come, hoping that the traumatic events of the day before might inspire a more meaningful and humane response. Several city councilmembers

and state legislators attended. We held the press conference while the camp was surrounded with State Troopers and MN-DOT vehicles. It felt excessive and intimidating. Law enforcement even brought a Long-Range Acoustic Device (LRAD).

13. After the press conference was over, law enforcement evicted everyone who had been living at the Wall. Because we were with people, we were able to help people move their belongings to the vacant lot, which became Camp Nenookaasi. Most evictions end with peoples' tents and belongings being destroyed. Imagine having to move all of your belongings in a morning, even in a matter of minutes. It is simply too much to physically move. Some people have carts or wagons, but many people are left with only what they can carry. Many people are elderly or disabled. Even if you can gather more together, where do you put it? How do you transport it? During evictions, people often have their phone, ID cards, important documents like birth certificates, bus cards lost or destroyed. Even if your stuff makes it into storage somewhere, it's often not practical or reasonable for unhoused people to travel to reclaim it. But when people were evicted from the Wall, it was different. Because we were there, we were able to help people gather their belongings and transport things to Camp Nenookaasi. We were also able to carry the ceremonial fire.
14. When we arrived, Nicole first hosted a talking circle with residents where everyone discussed what would be their shared agreements. Everyone agreed that they would work to keep the most vulnerable safe—elders, disabled people, women, two-spirit people. We have built a sense of safety, connection, community, and stability that many residents have not had for a long time. We've known that these evictions cause harm. But before Camp Nenookaasi, all spring and summer the frequency of evictions had escalated. Camp Nenookaasi has been a place to heal from that trauma.
15. At Camp Nenookaasi, we started to build trust. When we first started serving food, for example, people would grab so much because they didn't know when the next meal would come. But now those same people bring food to the elders first. I've seen people find themselves at Nenookaasi—residents who, at first, couldn't look you in the eye, would be afraid and distrustful. But over time residents have been able to authentically connect with each other and even with themselves. People who once struggled to make eye contact now can be seen giving statements at press conferences and city council meetings, empowered in this community together.
16. Camp Nenookaasi has also created space for people to grieve. As trust has grown, people have been able to open up and heal, to grieve trauma and loss, the passing of beloved residents. There have been so many beautiful moments as the Camp has grown.
17. As time has gone on, we have just kept building. For my part, I have worked hard to do the most good and the least harm. We try to keep the space as safe as we can, we work

hard to make sure people can depend on food. I was able to coordinate with a variety of different groups and make a schedule for food deliveries. That level of certainty and trust is so important. And we built our own kitchen so that when food deliveries fall through, we make sure people still eat.

18. We also worked hard to source materials and build yurts so that people have warm places to stay in the winter. We have a large healing tent, with a wood-burning stove to keep people warm. We are doing our best to honor the earth and keep the Camp rooted in Indigenous principles. And residents themselves take pride in the camp. They take care of it, pick up after themselves and each other, and make meals. Residents are invested in keeping each other safe and building a strong community together—they have participated, for example, in Narcan training, de-escalation training, and bike workshops.
19. I want to be clear that Camp Nenookaasi isn't something that Nicole or I did for people. This is something we did with people. Camp Nenookaasi is many people coming together—most of all the residents themselves doing the hard work of making this beautiful community together.
20. Camp Nenookaasi is critically important as a place for people to be to navigate the many hoops you have to jump through to get resources in our current system. People experiencing unsheltered homelessness are often pushed around from place to place, which makes it difficult if not impossible for outreach workers to consistently find them and work them, which leaves them without a path forward.
21. Because of Camp Nenookaasi, outreach workers from Agate, Avivo, Hennepin County Streets to Housing and so many others have been able to consistently work with people and help them to access housing, treatment, medical care, and other important resources. It can be a long process for outreach workers to help people get their ducks in a row—getting paperwork and documents together, resolving warrants, etc. Camp Nenookaasi helps people stay connected to these services, rather than disrupting this important work. It has been a stable place for people to have the time to do that, and that's why we've been able to have success.
22. Camp Nenookaasi has also been able to provide a safer community for people who have past traumas and have been the victims of abuse and violence. There are predatory people on the street, who prey on the most vulnerable. I've seen girls running or racing down the street on a bike trying to get away from someone trying to snatch them up. Camp Nenookaasi is a place where people look out for each other and there is safety in numbers.
23. Camp Nenookaasi has also been a place for relationship building. People who are housed are able to connect with their unhoused neighbors through community meals and events where the broader community is welcome. People who are unhoused often feel invisible

and uncared for, and it has been transformative for everyone in the community—for housed neighbors to recognize the humanity of their unhoused neighbors, for unhoused neighbors to be seen.

24. Hennepin County Streets to Housing and Healthcare for the Homeless have been a consistent presence at Camp Nenookaasi. The City has been less helpful. We fought for more than 100 days just to get porta-potties. We've actively sought partnership with government, and while we have the support of some of our city councilmembers, the City itself has been hostile, issuing the eviction notice based on a claim that there is a lack of public health and lack of access for emergency services. This is insulting considering it was our own government that we had to fight for sanitation services and bathrooms. When we finally got approval for the bathrooms, we found out that they had been ready for delivery for weeks prior. And only days after getting bathrooms, we got the eviction notice.
25. We don't pretend that Camp Nenookaasi is perfect. But we've housed 74 people in four months, which never would have happened without us. Outreach workers sing our praises and many government officials see the work we are doing and support us. One longtime East Phillips resident was quoted in the news as saying she has never seen fewer needles on the ground.
26. Everyone at Camp Nenookaasi has been so anxious and scared since we got the eviction notice. It's like people finally feel safe and now the rug has been pulled out from under them. When people are in survival mode, there's only so much you can do. But when people are safe, they can let their guards down and start to heal.
27. We know when evictions happen and people lose their safety nets, they move back into survival mode. There's a sense of desperation and lack of social safety, which leads to an increase in spread of HIV and Hepatitis, people go missing, fires as people desperately try to stay warm. I worry about people freezing to death, I worry about disabled and elderly people. I worry about overdose deaths, because when you are experiencing that level of trauma it is understandable that people use, relapse, overdose, and then you're alone so that you're in crisis there is no one to help you.
28. Evictions will also make it hugely difficult for people to stay connected to resources, to lose their housing spots, to lose that opportunity to continue building on the stability people have at Camp Nenookaasi.
29. The plan for eviction day has evidence a willful incompetence at the expense of human life. The initial "plan" was to send people to the Mary Frey Opportunity Center to then identify resources and plans for people. But Mary Frye does not provide overnight shelter and does not have the capacity to provide services to the number of residents who are being displaced. Sending people to a place that may or may not be able to help them

and that does not even provide shelter itself is not a plan. As of today, the City is scrambling to identify another “plan,” but like the numerous evictions that have happened before, it does not seem like they will be able to create a realistic and humane plan.

30. If we evict Camp Nenookaasi without a plan for residents, it will only compound the struggles of the East Phillips neighborhood. The harms and traumas of people who lack resources and are at the intersection of many forms of oppression and harm will be back on the street. Residents will be further traumatized, their homes destroyed, their belongings trashed, the community scattered. We’re doing so much good, why would you destroy this.

I declare under penalty of perjury that this declaration is true and correct.

Executed on December 15, 2023, in the City of Minneapolis, County of Hennepin, State of Minnesota, Treaty-Ceded Territory of the Dakota peoples.

A handwritten signature in black ink, appearing to read "Christin Crabtree", written over a horizontal line.

Christin Crabtree